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13 UNITED STATES DISTRICT COURT
14 EASTERN DISTRICT OF CALIFORNIA
15 SACRAMENTO DIVISION

16 JAMES PEARSON,
17 Plaintiff,
18 vs.
19 KAISER FOUNDATION HOSPITALS, et
al.
20 Defendants.

21 Case No. 2:20-cv-02335-MCE-KJN
22
23 **STIPULATION REGARDING FACT
DISCOVERY DEADLINE; ORDER**

24 Plaintiff JAMES PEARSON (“Plaintiff”) and Defendants KAISER
25 FOUNDATION HOSPITALS, THE PERMANENTE MEDICAL GROUP, INC.
26 (“Kaiser”) and COMMONSPIRIT HEALTH (“Commonspirit”) (collectively,
27 “Defendants”) stipulate, through their undersigned counsel, that the deadline to
28 complete the deposition of Kaiser’s Person Most Qualified witness in response to
plaintiff’s May 31, 2022, deposition notice be continued from **June 10, 2022, to July
29, 2022**. The parties believe that good cause exists based on the following:

1. On May 18, 2022, Plaintiff filed a motion requesting a continuance of the fact discovery deadline so that he can depose Kaiser's 30(b)(6) witness.

2. On May 31, 2022, the Court granted Plaintiff's request and continued the fact discovery deadline to June 10, 2022. ECF No. 27.

3. On May 31, 2022, Plaintiff noticed a 30(b)(6) deposition to occur remotely on June 10, 2022.

4. On June 7, 2022, Kaiser objected to the deposition on the grounds that the witness is not available on June 10, 2022.

5. The parties have met and conferred. Kaiser's counsel has agreed to produce the witness for the deposition within the next month in response to the deposition notice served on May 31, 2022. Kaiser's counsel currently has a trial scheduled in another matter to begin on June 20 and is unavailable over the next several weeks.

6. Based on the foregoing, the parties request that the fact discovery deadline be continued to July 29, 2022 for the sole purpose of holding the deposition 30(b)(6) deposition.

7. The parties do not seek a modification of any other deadlines, including but not limited to the December 12, 2022, deadline to file dispositive motions based off the previous extension of fact discovery.

Respectfully submitted,

Dated: June 13, 2022

/s/ Irakli Karbelashvili

By Irakli Karbelashvili, Attorney
for Plaintiff JAMES PEARSON

Dated: June 13, 2022

/s/ *Ondrej Likar*

By Ondrej Likar, Attorney
for Defendants KAISER FOUNDATION
HOSPITALS; THE PERMANENTE MEDICAL
GROUP, INC

Dated: June 13, 2022

/s/ Elizabeth B. Stallard

By Elizabeth B. Stallard, Attorney
for Defendant COMMONSPIRIT HEALTH, a
Colorado corporation, d/b/a ST. JOSEPH'S
BEHAVIORAL HEALTH

ORDER

Having reviewed the Parties' stipulation, and good cause appearing, the deadline to complete fact discovery is hereby continued to July 29, 2022, solely to conduct the remaining deposition addressed by Plaintiff's May 31, 2022, deposition notice. The deadline to file dispositive motions remains December 12, 2022. This Order does not modify any other deadlines.

IT IS SO ORDERED.

Dated: June 30, 2022


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE